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all prior taxes on property have been paid, is in conflict with a constitutional provision against deprivation of property without due process of law. *Hanley, P. J., dissenting.*

That a legislature is competent to declare certain documents presumptive or prima facie evidence is everywhere admitted. *Pillow v. Roberts*, 13 How. 472; *Allen v. Armstrong*, 16 Iowa 508, but the opposite is universally held in regard to the power of a legislature to make such documents conclusive evidence of their own contents. *Cooley on Taxation*, 298; *Abbott v. Lindemower*, 42 Mo. 162; *Kelley v. Herrall*, 10 Saw. 169; *McCready v. Sexton*, 29 Iowa 356. On the other hand, the universal doctrine that a statute will not be declared unconstitutional, except where the conflict between its provisions and the organic law is so palpable as to leave no doubt of its validity, and the fact that there is a substantial distinction between a tax deed being conclusive evidence of its own recitals, and a law making it conclusive evidence that an officer has done his duty, leads several of the States to hold that under these circumstances the legislature can make a tax deed conclusive evidence that all prior taxes have been paid. *Rollins v. Wright*, 93 Cal. 397; *Phelps v. Meade*, 41 Iowa 470.

CONSTITUTIONAL LAW—EVIDENCE—SELF-INCRIMINATING TESTIMONY.—*PEOPLE v. ADAMS*, 68 N. E. 636 (N. Y.).—Officers, under a search warrant, seized policy sheets and private papers which were used to prove the handwriting of the defendant and that the offices were occupied by him. *Held*, that this was not in violation of the constitution, as compelling the accused to testify against himself.

This is in harmony with the great weight of authority that private property, though illegally procured, is admissible in evidence in a criminal action. *Stiebert v. Illinois*, 143 Ill. 571; *State v. Griswold*, 67 Conn. 290; *Commonwealth v. Welsh*, 110 Mass. 359, and the remedy for such unlawful taking is an independent suit. *Commonwealth v. Tibbits*, 157 Mass. 519. *Contra, Boyd v. United States*, 110 U. S. 616, which distinguishes between the compulsory production of private property, such as seizure of smuggled goods, or private papers, as circumstantial evidence of the existence of such matters, and the compulsory production of private papers as evidence of the truth of their contents, holding that in the former case there is no self-incriminating evidence, as the things are merely evidence as such; while in the latter case, it is equivalent to making the accused testify against himself, and is therefore unconstitutional. In point with the main case is *State v. Hial Mathers*, 64 Vt. 101, where an incriminating letter, illegally obtained, was admitted in evidence in a criminal action.

CONSTITUTIONAL LAW—INFANTS—FAILURE TO FURNISH MEDICAL ATTENDANCE.—*PEOPLE v. PIERSON*, 68 N. E. 243 (N. Y.).—Defendant did not call in a licensed physician to attend the dangerous illness of an adopted daughter, but depended upon faith to cure her. *Held*, the provisions of the Penal Code, making it a misdemeanor to omit to furnish medical attendance to a minor does not violate the constitutional provision guaranteeing freedom of worship.

A defense of religious belief cannot be set up to a violation of a law of public health: *Reg. v. Downes*, 13 Cox C. C. 111; nor of public policy; *State*

v. White, 64 N. H. 48. Nor do these rules violate the constitutional provision guaranteeing liberty in religious profession and worship. *Reynolds v. U. S.*, 98 U. S. 145. The furnishing of medical aid by a parent to his minor child is required by the common law. *Reg. v. Wagstaffe*, 10 Cox C. C. 530, and by statute both in England, 31 and 32 Vict., c. 122, sec. 37, and in most of the states. So that there is a strict analogy between this case and *Reynolds v. U. S.*, *supra*, where the provision in the constitution for liberty of religious profession was held not to shield the crime of bigamy. See also XIII *Yale Law Journal*, 42.

CRIMINAL LAW—EVIDENCE—FACTS RELEVANT—CONDUCT OF BLOODHOUNDS.—*BROTT v. STATE*, 97 N. W. 293 (NEB.).—*Held*, that the mere trailing of bloodhounds from the place where a crime is committed to the house of the accused is not proof sufficient to infer the commission of the crime therefrom.

Courts have taken notice of the power of bloodhounds to follow a man's trail, and evidence of their conduct is usually admitted as establishing the man's identity. *Hodge v. State*, 98 Ala. 10. In *Simpson v. State*, 111 Ala. 6, similar evidence was admitted without question, and the court went so far as to exclude evidence proving the unreliability of other dogs of the same breed and trained by the same man. But evidence of bloodhounds' trailing should be admitted only where circumstances were most favorable to enable them to track, and then only as a circumstance tending to connect the accused with the crime. *Pedigo v. Commonwealth*, 44 S. W. 143.

EMPLOYER AND EMPLOYEES—RIGHT TO EMPLOY—INJUNCTION.—*ATKINS v. FLETCHER Co.*, 55 ATL. 1074 (N. J.).—Complainants, being members of a machinists' association on strike, sought to restrain the defendants from interfering with their pickets. *Held*, the right of a voluntary association engaged in supporting a strike, to freedom in the labor market so that the association can readily employ pickets, is not a proper subject of protection by injunction.

In all cases heretofore the question of interference has been raised by the employers. And the law is well settled that where the defendants induced the plaintiff's employes to leave his service by using force, threats or intimidation, the act constituted an injury to property which a court of equity has jurisdiction to restrain by injunction. *Davis v. Zimmerman*, 91 Hun. 489; *Frank v. Herold*, 63 N. J. Eq. 443. In the principal case, it is the union which seeks the freedom of the labor market and, in view of the statement by the learned judge that "the complainants are before the court as employers," the decision seems to be in conflict with settled principles.

EVIDENCE—JOURNALS OF LEGISLATURE—COMPETENCY—ALTERATION BY PAROL.—*TOWN OF WILSON v. MARKLEY*, 45 S. E. 1023 (N. C.).—Where the question is whether a bill is passed in accordance with constitutional provisions requiring it to be read three times, *held*, that the journal imports absolute verity and cannot be altered or explained by parol.

Bank v. Commissioners, 119 N. C. 214, the case most nearly in point, supports the decision, holding the journal conclusive evidence as to whether the roll was called in accordance with constitutional provisions. In harmony with the main decision are also *McCulloch v. State*, 11 Ind. 424; *Burr & Co.*